

# **EXHIBIT 3**

Hernandez, Jasmine  
L.C., a minor v. State of California

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
Case No.: 5:22-cv-00949-KK-(SHKx)

L.C., a minor by and through her  
guardian ad litem Maria Cadena,  
individually and as  
successor-in-interest to Hector  
Puga; I.H., a minor by and through  
his guardian ad litem Jasmine  
Hernandez, individually and as  
successor-in-interest to Hector  
Puga; A.L., a minor by and through  
her guardian ad litem Lydia Lopez,  
individually and as  
successor-in-interest to Hector  
Puga; and ANTONIA SALAS UBALDO,  
individually,

Plaintiffs,

v.

STATE OF CALIFORNIA; COUNTY OF  
SAN BERNARDINO; S.S.C., a nominal  
defendant; ISAIAH KEE; MICHAEL  
BLACKWOOD; BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS; and  
DOES 6-10, inclusive,

Defendants.

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VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
JASMINE HERNANDEZ

Wednesday, December 11, 2024, 9:03 a.m.

Taken remotely via Zoom

REPORTED BY: Mary P. Randle, CSR No. 10312

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2 (Appearances via videoconference)

3  
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Also Present:

Vionela Vaughn-Austin, Videographer

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1 TAKEN REMOTELY VIA ZOOM

2 WEDNESDAY, DECEMBER 11, 2024

3 9:03 A.M.

4  
5 THE VIDEOGRAPHER: Good morning. This is the  
6 video deposition of Jasmine Hernandez, taken remotely on  
7 December 11th, 2024, in the matter of L.C. versus  
8 State of California, Case Number  
9 5:22-cv-00949-KK-(SHKx). This case is being heard in  
10 the United States District Court of Central District of  
11 California. This deposition is being taken on behalf of  
12 the Defendant.

13 My name is Vionela Vaughn-Austin. I'm the  
14 legal videographer contracted through Dean Jones Legal  
15 Videos, Inc., of Los Angeles and Santa Ana, California.  
16 Now, because we are not in person, as the videographer,  
17 I may have to interrupt the proceedings should the  
18 deponent drift -- or the witness drift out of frame or  
19 should any Zoom connectivity issues occur.

20 This deposition is commencing at 9:03 a.m.  
21 Would all present please identify yourselves, starting  
22 with the court reporter, then the witness, and then  
23 counsel.

24 THE COURT REPORTER: My name is Mary Randle  
25 with Jilio-Ryan.

1 THE WITNESS: My name is Jasmine Hernandez.

2 MS. GUSTAFSON: Shannon Gustafson for the  
3 County Defendants.

4 MS. ESQUIVEL: Diana Esquivel for the State  
5 Defendants, appearing from Sacramento.

6 MS. LE: Hang Le for the Deponent and for the  
7 Plaintiffs in L.C., et al., versus State of California,  
8 et al.

9 THE VIDEOGRAPHER: Thank you. Now, would the  
10 court reporter please administer the oath.

11  
12 JASMINE HERNANDEZ,  
13 having been first duly sworn, was examined and  
14 testified as follows:

15  
16 EXAMINATION

17 BY MS. GUSTAFSON:

18 Q Can you please state your name for the record.

19 A Jasmine Hernandez.

20 Q Have you ever used any name other than  
21 Jasmine Hernandez?

22 A No.

23 Q Have you ever had your deposition taken before?

24 A No.

25 Q I'm sure you had an opportunity to speak with

1 A Years before Isaiah was born.

2 Q So, years before Isaiah was born you knew  
3 Hector as a friend, and you saw something on the news  
4 about him. Is that fair to say?

5 A Yes.

6 Q And what was it you saw on the news?

7 A Hector in a police pursuit.

8 Q And when you saw this news about the police  
9 pursuit, you recognized that it was the Hector that you  
10 knew?

11 A Yes.

12 Q What do you recall about what happened during  
13 the police pursuit?

14 A Hector not stopping.

15 Q Did you also see on this news channel that he  
16 shot at police?

17 A Yes.

18 Q And did you see that Hector was shot by the  
19 police?

20 A Yes.

21 Q Did you ever talk to Hector about what happened  
22 that day when he shot at the police?

23 A No.

24 Q Why not?

25 A I believed his affairs were his affairs and my



1      affairs were my affairs.

2            Q      If I understand you correctly, it's fair to say  
3      that you never talked to Hector about the reasons that  
4      he was running from police or shooting at police?

5            A      No. He would never discuss that with me.

6            Q      Did he ever talk to you about the fact that he  
7      was shot by the police?

8            A      Yes, because he -- when he came home, he would  
9      have leg pain and some side pain when it was cold.

10          Q      Other than talking about the pain, did he tell  
11      you anything else about his injuries that day?

12          A      No.

13          Q      Do you know how long he went to jail after  
14      shooting at the police?

15          A      I believe four -- four years.

16          Q      Did you ever go see him when he was in jail  
17      during those four years?

18          A      No.

19          Q      Did you have any communications with him during  
20      those four years that he was incarcerated after the  
21      shooting with police?

22          A      Yes.

23          Q      How did you communicate with him?

24          A      He would call my phone collect.

25          Q      And you would take his calls?

1 STATE OF CALIFORNIA )  
2 )  
3 COUNTY OF SAN DIEGO )  
4

5 I, Mary P. Randle, Certified Shorthand  
6 Reporter in and for the State of California,  
7 Certificate No. 10312, do hereby certify:

8 That prior to being examined, the witness named  
9 in the foregoing deposition was by me first duly sworn  
10 to testify to the truth, the whole truth, and nothing  
11 but the truth;

12 That said deposition was taken remotely before  
13 me at the time and place therein set forth and was taken  
14 down by me in shorthand and thereafter transcribed into  
15 typewriting under my direction and supervision;

16 I further certify that I am neither counsel for,  
17 nor related to, any party to said action, nor in any way  
18 interested in the outcome thereof.

19 In witness whereof, I have hereunto subscribed my  
20 name.

21 Dated: December 22, 2024  
22

23 Mary Randle, CSR#10312  
24 MARY P. RANDLE  
25 CSR No. 10312